

Serial Number: 09/695,794

Docket Number: 10003591-1

**REMARKS**

Upon entry of this Response, claims 1-20 remain pending in the present patent application. No amendments are presented herein, where the listing of the claims is provided for the sake of convenience. Applicant requests reconsideration of the pending claims in view of the following remarks.

Claims 1-20 have been rejected under 35 U.S.C. §102(e) as being anticipated by U.S. Patent 6,209,048 issued to Wolff (hereafter "Wolff"). Anticipation under §102 "requires the disclosure in a single prior art reference of each element of the claim under construction. W.L. Gore & Associates, Inc. v. Garlock, Inc., 220 USPQ 303, 313 (Fed. Cir. 1983). Applicant respectfully asserts that Wolff fails to show or suggest each of the elements of claims 1-20. Accordingly, Applicant requests that the rejection of these claims be withdrawn.

To begin, claim 1, for example, states as follows:

1. A method for providing network access to a web server in a peripheral device, comprising the steps of:
  - identifying a request from a client received by a host via a network to be forwarded to the web server located on the peripheral device locally coupled to the host;
  - forwarding the request from the host to the web server located on the peripheral device;
  - transmitting a response to the request from the web server located in the peripheral device to the host; and
  - transmitting the response from the host to the client.

With respect to claim 1 above, the Office Action states:

"As per claims 1-20, Wolff teaches all the concept and limitations of a method for providing network access to a web server in a peripheral device, comprising the steps of: identifying a request from a client received by a host via a network to be forwarded to the web server located on the peripheral device locally coupled to the host; forwarding the request from the host to the web server located on the peripheral device;

Transmitting a response to the request from the web server located in the peripheral device to the host; and transmitting the response from the host to the client (see fig 1-2; col. 2 line 34 to col. 7 line 12). All the other limitations of the other claims such as opening connection, identifying means, and transmitting means are either implicitly or explicitly taught by Wolff (see fig 103 and col. 2 line 34-col. 7 line 12)." (Office Action, pages 2-3).

Applicant respectfully disagrees. In particular, Wolff merely describes peripherals that are coupled to a network as shown with reference to Fig. 2. In

Serial Number: 09/695,794Docket Number: 10003591-1

particular, the user communicates with a web server in the peripheral 200 by using a browser 204 in a remote computer that facilitates communication with the web server and the peripheral through the network 203. The peripheral is coupled to the network.

In contrast, the invention as claimed by claim 1 above specifies that a request from a client is received by a host via a network to be forwarded to the web server located on the peripheral device that is locally coupled to the host. In this respect, the peripheral device is coupled directly to the host and not directly to the network as described by Wolff. Thus, the host computer must be configured to act as a middleman between the request received in the network and the server in the peripheral.

In fact, rather than show or suggest the concept of transmitting requests to a web server in the client through a host to which the peripheral device is coupled as set forth in claim 1, Wolff teaches away from such a concept. For example, in column 2, lines 50-55, Wolff states as follows:

"If an individual does not have access to a host computer with the proper driver, then the peripheral cannot be controlled. Moreover, if an individual is at a remote site, one may not have access to the host computer, yet would still like to control peripherals. Therefore, there is a need to be able to control peripherals directly, without relying on a host as an interface. Furthermore, it is desirable to allow the same control from a remote location."

Thus, Wolff directly states that the peripheral cannot be controlled if the user is unable to manipulate the host to which the peripheral is coupled. In addition, in column 3, lines 44-57, under a column heading of "Overview of the Present Invention," Wolff states the following:

"The present invention provides peripherals that are coupled to a network and are able to respond to requests from the network. In one embodiment, the requests are associated with the worldwide web (the WWW). In the present invention, peripherals act as WWW servers. That is, peripherals are directly coupled to a local area network (LAN) or wide area network (WAN) in "serve" data, such as images or other multimedia objects, that they capture or create to requesting agents on the network."

In this respect, Wolff teaches coupling peripherals directly to a network, not to a host as claimed in the present application. In addition, Wolff unambiguously and directly

Serial Number: 09/695,794Docket Number: 10003591-1

disavows the embodiments of the present invention as set forth in the above claims. Specifically, at col. 5, lines 25-29, Wolff states:

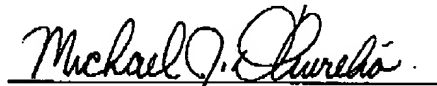
"The present invention is generally advantageous in that as a peripheral acts as a web server, it does not need to interact directly with any particular "host"."

In fact, Wolff is replete with discussion of the direct coupling of a peripheral to a network and the benefits obtained as a result. Nowhere does Wolff show or suggest the concept of communicating with a web server and a peripheral through a host, with peripherals coupled to the host as claimed.

Accordingly applicant requests that the rejection of claim 1 be withdrawn. In addition, Applicant requests that the rejection of claims 6, 11, 15, and 17 be withdrawn to the extent that the above reasons discussed above apply. In addition, Applicant respectfully requests that the rejection of claims 2-5, 7-10, 12-14, 16, and 18-20 be withdrawn as depending from claims 1, 6, 11, 15, or 17.

In addition, if the Examiner has any questions about the above discussion, Applicant respectfully invites the Examiner to contact the undersigned counsel at the phone number indicated below.

Respectfully submitted,



Michael J. D'Aurelio  
Reg. No. 40,977

**Thomas, Kayden, Horstemeyer & Rlsley, L.L.P.**  
100 Galleria Parkway, N.W.  
Suite 1750  
Atlanta, Georgia 30339-5948  
Phone: (770) 933-9500  
Fax: (770) 951-0933